



The Taxation Section of the State Bar of California

Qualifies for  
16 Hours MCLE,  
Legal Specialization  
and CPE Credit

# 2008 Annual Meeting of the California Tax Bar & California Tax Policy Conference

The Premier California Tax Education Event



**NOVEMBER 6-8, 2008**

**Grand Hyatt San Francisco**

345 Stockton Street

San Francisco, CA

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The State Bar of California Taxation Section in Partnership  
with the Franchise Tax Board and State Board of Equalization present the

## 2008 Annual Meeting of the California Tax Bar & California Tax Policy Conference

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On behalf of the Taxation Section of the State Bar of California, I invite you to the *2008 Annual Meeting of the California Tax Bar & California Tax Policy Conference*. After a stunning resurgence last year, the California Tax Policy Conference (CTPC), formerly sponsored by the California Franchise Tax Board, is back again and will continue to be held concurrently with the Annual Meeting of the California Tax Bar.

With our partnering organizations, the Franchise Tax Board and State Board of Equalization, this year's combined Conference will offer 41 leading-edge educational sessions, including 12 State & Local Tax programs and 29 comprehensive federal tax programs in the areas of Estate & Gift Tax, Procedure and Litigation, Corporate Tax and Business Entities, International Tax, Tax Exempt Entities, Tax Policy and programs by the Young Tax Lawyers.

All programs are open to *all* meeting registrants, which include corporate tax managers, attorneys, tax accountants, financial planners, enrolled agents, government tax officials, legislators and their staff, and other tax professionals.

The 2008 Conference will feature a record number of state and federal government officials from the Internal Revenue Service, the United States Tax Court, the U.S. Department of Justice, the U.S. Senate Committee on Finance, the California Franchise Tax Board, the California State Board of Equalization, the California Employment Development Department, the California State Controller's Office, and the California Office of the Attorney General.

The nation's leading tax practitioners have contributed excellent technical tax programs of interest for any tax professional. Scheduled to appear are **Donald L. Korb**, Chief Counsel of the Internal Revenue Service; **Geoff Way**, Chief Counsel of the California Franchise Tax Board; **Kristine Cazadd**, Chief Counsel of the California State Board of Equalization; **Deborah Butler**, Associate Chief Counsel of the IRS, Procedure and Administration; Judge **Mary Ann Cohen** of the United States Tax Court; and **Nathan Hochman**, Attorney General of the Tax Division of the U.S. Department of Justice.

Aside from the exceptional educational content, the Conference presents a unique opportunity for registrants to engage in several networking events throughout the weekend—events designed to give attendees an opportunity to meet, confer, and mingle with colleagues and government officials on an informal basis. Among the events scheduled are Committee luncheons on Thursday afternoon, including a special CTPC luncheon; dinners for CTPC and Tax Annual Meeting attendees on Friday evening; a keynote and awards luncheon on Saturday; and cocktail receptions on Thursday and Friday evening. Networking events are open to all registrants (although lunches and dinners are separately ticketed events).

Finally, the Tax LLM Job Fair will return and will take place during this year's Conference beginning at 8:00 am on Thursday, November 6. The Tax LLM Job Fair is sponsored by Chapman University School of Law, Golden Gate University School of Law, Loyola Law School, and University of San Diego School of Law. Employers who are interested in participating may sign-up with the application included with this brochure.

I am excited about this year's Annual Meeting of the California Tax Bar & California Tax Policy Conference, and hope you will join us in San Francisco for an extraordinary weekend!

Carley A. Roberts, Chair  
2008 Annual Meeting of the California Tax Bar & California Tax Policy Conference



# PROGRAMS BY COMMITTEE

## Corporate & Business Entities

- [7] The Credit Crunch – Does it Make Cents to Abandon a Partnership or LLC Interest that is Worthless? (co-sponsored by Income & Other Taxes)
- [17] The Creative Use of Pass-Through Entities in Corporate Transactions
- [39] Buying and Selling Subsidiaries from a Consolidated Group

## Estate & Gift Tax

- [2] Annual Estate and Gift Tax Update
- [15] (Corporate) Entity Exit Strategies in Estate Planning (co-sponsored by Corporate & Business Entities)
- [20] Tax-Efficient Wealth Transfer to Multiple Generations
- [27] New Developments in Transfer Tax Valuation
- [31] What's On the Horizon for the Insurance Valuation Landscape?

## Executive Committee, State Bar Taxation Section

- [34] Federal Procedural Roundtable (co-sponsored by Procedure & Litigation)

## Exempt Organizations

- [12] Abuse of Exempt Organizations in the Tax Shelter Context
- [22] Use of Retirement Benefits in Charitable Planning (co-sponsored by Estate & Gift)
- [30] Paying Competitive Executive Compensation at Tax Exempt Organizations

## Income & Other Taxes

- [11] The Big GAAP: A Guide for Tax Professionals in the Accounting for Uncertain Income Tax Positions in a Transparent World (co-sponsored by Corporate & Business Entities and Procedure & Litigation)
- [21] Has the Attorney-Client Privilege Met Its Demise?
- [35] Fallout of the Economic Downturn: Federal and State Tax Consequences of Bankruptcy, Foreclosures and Insolvency (co-sponsored by Procedure & Litigation)
- [40] Hot Topics with Like-Kind Exchanges

## International Tax

- [6] Tax and Estate Planning for the Multinational Family (co-sponsored by Estate & Gift)
- [10] A Primer on Navigating the New Dynamic International Tax Planning Environment for High Value Intangibles
- [16] Inbound Real Estate Investment in the Era of the Declining Dollar

## Procedure & Litigation

- [1] Getting to YES with the IRS: A Couple of Laps Around the Fast Track in the IRS's Newest Fleet of ADR Vehicles
- [5] Offshore Enforcement Update (co-sponsored by International Tax)
- [9] Federal and State Criminal Tax Investigations and Corporate Fraud
- [14] Sales and Use Tax Audits: A Guide for Tax Professionals (co-sponsored by CTPC)
- [19] California Trustees Beware
- [24] Revised Return Preparer Penalties and Their Potential Impact on Preparing Returns (co-sponsored by Young Tax Lawyers)
- [29] Federal and State Employment Tax Enforcement: A High Priority Concern for the Government
- [38] Overview of the Federal and California Taxpayer Advocate Programs

## California Tax Policy Conference (State & Local Tax)

- [4] The ABC's of Settlement at the FTB and BOE
- [8] California Chief Counsel Roundtable
- [13] Sizzling California State & Local Tax Litigation
- [18] Humor in the High Court
- [23] The BOE's New Rules for Tax Appeals
- [26] California Income Tax Withholding: Unveiling the Mysteries at the FTB and EDD
- [28] Sales & Use Tax Hot Topics and Recent Developments
- [32] State Tax Issues Affecting the High Tech Industry
- [33] Ethical Practices in a New World
- [36] California Regulatory and Administrative Changes: Year in Review
- [41] Special Issues in Apportionment and Allocation - What Now? And What about MeadWestvaco?
- [49] Revisions to the Uniform Division of Income for Tax Purposes Act: Myth or Reality?

## Tax Policy, Practice & Legislation

- [25] Economic Substance Doctrine: Where Do We Stand? (co-sponsored by Procedure & Litigation)

## Young Tax Lawyers

- [3] Choice of Entity: Swimming in a Sea of Options (co-sponsored by Corporate & Business Entities)
- [37] The California Tax Administrative Process: What Every Taxpayer and Practitioner Need to Know (co-sponsored by CTPC)

# TICKETED EVENTS

## Thursday, November 6

### Thursday Committee Luncheons

Ticketed Event #42-48 (\$35)

12:00 noon

Committees of the State Bar Taxation Section hold luncheons for their members to meet one another and discuss committee business and activities. Lunches are open to all tax professionals. Indicate which luncheon you will attend on the Program Registration form. The cost to attend a Tax Committee luncheon is \$35, which is not included in the Conference registration fee.

### California Tax Policy Conference Luncheon

Ticketed Event #49 (\$35 per person)

12:00 noon

Sponsored by Ernst & Young LLP

*"Revisions to the Uniform Division of Income for Tax Purposes Act: Myth or Reality?"*

Join us at the annual CTPC luncheon program. This year Prentiss Willson of Ernst & Young LLP will discuss the status of the Revision Project, who is involved, and what changes are anticipated. **Attendees receive 1 Hour MCLE, Legal Specialization and CPE Credit.**







# GOVERNMENT SPEAKERS

(State and Federal Government Speakers  
Names Available at Press Time)

Elizabeth Abreu, Tax Counsel IV, California State Board of Equalization

William D. Alexander, Associate Chief Counsel (Corporate),  
Internal Revenue Service

Patrick J. Bittner, Settlement Bureau Director, California Franchise Tax Board

Michael B. Blumenfeld, Senior Technician Reviewer, Tax Exempt and  
Government Entities, Internal Revenue Service, Chief Counsel

Deborah Butler, Associate Chief Counsel, Procedure and Administration,  
Internal Revenue Service

Carla Caruso, Supervising Tax Counsel, California State Board of Equalization

Kristine Cazadd, Chief Counsel, California State Board of Equalization

Hon. Mary Ann Cohen, Judge, U.S. Tax Court

Patricia A. Donahue, Area Counsel SB/SE, Internal Revenue Service

Randy M. Ferris, Tax Counsel IV, Tax & Fee Programs Division,  
California State Board of Equalization

Todd Gilman, Chief Taxpayers' Rights Advocate, California State  
Board of Equalization

L. Red Gobuty, Tax Counsel, California Franchise Tax Board

Daniel Gonzalez, Supervising Special Agent Investigations Bureau,  
California Franchise Tax Board

Theodore S. Goodwin, Senior Staff Counsel, California Employment  
Development Department

Steven J. Green, Deputy Attorney General, California Office of Attorney General

Bradley Heller, Tax Counsel III (Specialist), California State Board of Equalization

William C. Hilson, Jr., Supervising Tax Counsel, California Franchise Tax Board

Nathan J. Hochman, Attorney General of the Tax Division,  
U.S. Department of Justice

Maria Hwang, Director of Field Operations – West, Internal Revenue Service

Belinda J. Johns, Senior Assistant Attorney General, California Attorney  
General's Office

Carl Joseph, Tax Counsel IV, California Franchise Tax Board

Donald L. Korb, Chief Counsel, Internal Revenue Service

Michelle D. Korb, Industry Counsel, Technology Issues, Internal Revenue Service

Patrick Kusiak, Bureau Director, California Franchise Tax Board

Bruce Langston, Tax Counsel IV, California Franchise Tax Board

Marcy Jo Mandel, Deputy State Controller, Taxation, Office of California State  
Controller John Chiang

Michele Mosley, Taxpayer Rights Advocate, California Employment  
Development Department

Scott G. O'Brian, Special Agent in Charge, Internal Revenue Service,  
Criminal Investigation

Joshua Odintz, Tax Counsel, United States Senate, Committee on Finance

Nina E. Olson, National Taxpayer Advocate, Internal Revenue Service

Natasha Page, Tax Counsel III, California Franchise Tax Board

Christopher Parker, Tax Counsel, California Franchise Tax Board

Kirk M. Paxson, Area Counsel, Pacific Coast Tax Exempt and Government Entities,  
Internal Revenue Service

Bettie Ricca, Deputy Associate, International Field Service and Litigation,  
Internal Revenue Service

Laurel M. Robinson, Associate Area Counsel, LMSB, Internal Revenue Service

Steve Sims, EA, Taxpayer Advocate, California Franchise Tax Board

Luis Tejeda, Fraud Technical Advisor Group Manager, Internal Revenue Service

Robert Tucker, Tax Counsel III (Specialist), California State Board of Equalization

Geoff Way, Chief Counsel, California Franchise Tax Board

Mark A. Weiner, Senior Counsel, Tax Exempt and Government Entities,  
Internal Revenue Service

## Friday, November 7

### Networking Luncheon

Ticketed Event #52 (\$35)

11:45 am

This luncheon is planned to give conferees an opportunity to  
"grab a box lunch" and network in an informal setting.

### Annual Meeting of the California Tax Bar Dinner

Ticketed Event (\$60) • 7:30 pm

Sponsored by Holme Roberts & Owen LLP

### California Tax Policy Conference Dinner (CTPC)

Ticketed Event (\$45) • 7:30 pm

Sponsored by Morrison & Foerster LLP, Pillsbury Winthrop  
Shaw Pittman LLP, and Reed Smith LLP

## Saturday, November 8

### Keynote & Award Luncheon

Ticketed Event (\$45)

12:30 pm

The 2008 Conference will conclude with a  
luncheon with the keynote address by

**Donald L. Korb**, Chief Counsel of the Internal  
Revenue Service. Mr. Korb will offer his insights  
on "The Practice of Tax Law in Today's Changed Law  
Enforcement Environment". The luncheon also

features presentation of the V. Judson Klein Award

to **Layton L. Pace, Attorney at Law, Manhattan Beach,**

and the Joanne M. Garvey Award to **Honorable Mary Ann Cohen,**  
**United States Tax Court, Washington, DC.**





# PROGRAM SCHEDULE

The California Tax Policy Conference Programs are given in blue.

## THURSDAY NOVEMBER 6

**8:00-11:15 AM**

**Tax LL.M. Job Fair**

**11:00-5:30 PM**

**Conference Registration**

**12:00-1:15 PM**

**Committee Luncheons (Ticketed Event #'s 42-48, \$35)**

**12:00-1:15 PM**

**1 Hour MCLE, Legal Specialization and CPE Credit**

**California Tax Policy Conference Luncheon**

**(Ticketed Event \$35)**

Sponsored by Ernst & Young LLP



**[49] Revisions to the Uniform Division**

**of Income for Tax Purposes Act: Myth or Reality?**

Discussion of the current status of the revision project, who is involved, and what changes are anticipated.

Speaker:

Prentiss Willson, Ernst & Young LLP, Larkspur

## Thursday Concurrent Education Panels

**1:30-3:00 PM**

**1.5 Hours MCLE, Legal Specialization and CPE Credit**

**[1] Getting to YES with the IRS: A Couple of Laps Around the Fast Track in the IRS's Newest Fleet of ADR Vehicles**

*Procedure & Litigation*

Our panel of experts will review the pros and cons of the IRS's current fleet of alternative dispute resolution hybrid vehicles including the procedures for requesting Pre-Filing Agreements, Advance Pricing Agreements, CAPs, Early Referrals, AIRs, MAAPs, Art Appraisal Statements, IIRs, Fast Track settlement/arbitration, CCRs, and post-Appeals Mediation and post-Appeals Arbitration. What are these ADR vehicles and will they work for you or your client's tax controversy? Panelists will share their experiences to help you avoid the lemons and identify the sleepers in the field so you too can successfully drive your case over the audit finish line quicker and with all four wheels down.

Speakers

Patricia A. Donahue, Internal Revenue Service, San Francisco

Debra Estrem, Deloitte Tax LLP, San Francisco

William H. Quealy, Jr., KPMG LLP, San Diego

Laurel M. Robinson, Internal Revenue Service, San Francisco

**[2] Annual Estate and Gift Tax Update**

*Estate & Gift Tax*

An annual survey of new legislation, case law and topics of interest to estate and gift tax professionals.

Speaker

James M. Allen, Leland, Parachini, Steinberg, Matzger & Melnick, LLP,  
San Francisco

**[3] Choice of Entity: Swimming in a Sea of Options**

*Young Tax Lawyers co-sponsored by Corporate & Business Entities*

C Corporation? S Corporation? LLC? Partnership? Qualified Small Business Corporation? Disregarded Entity? LLC or partnership treated like any of the foregoing? Series LLC? The possibilities when choosing the legal and tax form of an entity seem endless, and yet there is no decision that is more likely to affect the amount and timing of the taxes to be paid by the entity and its founders. Along with the basics, this panel will explore recent changes in the law and some of the more subtle nuances that need to be considered when making this important decision.

Speakers

Perry DeLay, Downey Brand, LLP, Sacramento

Michael Pearson, McDonough Holland & Allen PC, Sacramento

**[4] The ABC's of Settlement at the FTB and BOE**

*CTPC (State & Local Tax)*

Hear it from the horse's mouth! Our panelists will provide an in-depth discussion and review of the settlement processes at both the Franchise Tax Board and State Board of Equalization.

Speakers

Elizabeth Abreu, California State Board of Equalization, Sacramento

Patrick J. Bittner, California Franchise Tax Board, Sacramento

Steve Danowitz, Ernst & Young LLP, Los Angeles

Rick Richman, Deloitte Tax LLP, Los Angeles

**3:15-5:15 PM**

**2 Hours MCLE, Legal Specialization and CPE Credit**

**[5] Offshore Enforcement Update**

*Procedure & Litigation co-sponsored by International Tax*

The panelists from relevant federal agencies will discuss the current updates in enforcing international tax compliance for US taxpayers. Cases, enforcement targets and new reporting requirements will be discussed.

Speakers

John A. Harbin, Carico Rice Toomey LLP, El Segundo

Bettie Ricca, Internal Revenue Service, Washington, DC

Michael Sanders, Michael R.E. Sanders PLLC, Bothell, WA

Martin A. Schainbaum, Martin A. Schainbaum, PLC, San Francisco



**[6] Tax and Estate Planning for the Multinational Family**

*International Tax co-sponsored by Estate & Gift Tax*

The program will be a "role play" illustrating cross-border tax and estate planning concepts and principles for the high net worth individual and family entities.

Speakers

M. Katharine Davidson, Dreier Stein Kahan Browne Woods

George LLP, Santa Monica

Lawrence H. Heller, Bryan Cave LLP, Santa Monica

William K. Norman, Ord & Norman, Los Angeles

Barbara M. Zak, Ord & Norman, Los Angeles

**[7] The Credit Crunch – Does it Make Cents to Abandon a Partnership or LLC Interest that is Worthless?**

*Corporate & Business Entities co-sponsored by Income & Other Taxes*

This panel of experts will discuss opportunities for tax planning and the implications of debt restructuring and cancellation during the credit crunch; and tax return disclosure obligations which arise when partnership/LLC or other investments end up being worthless. Discussion will include IRC Sections 108, 165 and 166; the newly issued final regulations on treatment of abandonment losses at Treas. Reg. section 1.165-2; the differences between recourse versus non-recourse liabilities; issues related to writing investments off at the entity versus the individual level; what needs to be disclosed on tax returns; and what "preparers" need in their files if they don't recommend making full disclosure.

Speakers

Joseph K. Fletcher, III, Morrison & Foerster LLP, San Francisco

Belan Wagner, Wagner Kirkman Blaine Klomparens &

Youmans LLP, Mather

Minna C. Yang, Wagner Kirkman Blaine Klomparens &

Youmans LLP, Mather

**[8] California Chief Counsel Roundtable**

*CTPC (State & Local Tax)*

A comprehensive annual update of developments in the franchise, sales and use and property taxes areas, including significant administrative developments, by our panel of California tax agency Chief Counsels and other state tax experts.

Speakers

Kristine Cazadd, California State Board of Equalization, Sacramento

Eric J. Coffill, Morrison & Foerster LLP, Sacramento

Annie Huang, Pillsbury Winthrop Shaw Pittman LLP, San Francisco

Marcy Jo Mandel, Office of California State Controller

John Chiang, Los Angeles

Geoff Way, California Franchise Tax Board, Sacramento

**5:30-6:30 PM**

**Conference Reception**

All conferees invited to attend.

**FRIDAY NOVEMBER 7**

**7:00-8:00 AM**

**Continental Breakfast**

**7:00-5:15 PM**

**Conference Registration**

**Friday Morning Concurrent Education Panels**

**8:15-10:15 AM**

**2 Hours MCLE, Legal Specialization and CPE Credit**

**[9] Federal and State Criminal Tax Investigations and Corporate Fraud**

*Procedure & Litigation*

Panelists will discuss California's and the IRS Criminal Investigation Division's criminal tax investigations and prosecution efforts, including target issues and industries and efforts by the state to coordinate with the IRS. With fraud at the corporate level on the rise, the panelists will also discuss IRS investigations of corporate entities, fraud penalties applicable to corporate officers and shareholders and enforcement target issues.

Speakers

Daniel Gonzalez, California Franchise Tax Board, Sacramento

Robert S. Horwitz, Law Offices of A. Lavar Taylor, Santa Ana

Scott G. O'Brian, Internal Revenue Service, Oakland

Jay Weill, Sideman & Bancroft LLP, San Francisco

**[10] A Primer on Navigating the New Dynamic International Tax Planning Environment for High Value Intangibles**

*International Tax*

Intangible assets—product, market or process based—represent significant profit drivers for many companies. Companies experiencing international expansion frequently seek to achieve competitive advantages by lowering the income tax burden on their overseas operations by first locating, and then exploiting, their intangibles in a tax efficient manner. This program will address the rapidly changing landscape for structuring tax efficient international operations for intangibles-intensive companies, focusing on: (i) the status and attractiveness of cost sharing as a means to locate intangibles outside of the United States given recent IRS pronouncements regarding the use of the investor model as the best method; and (ii) the opportunities and challenges for designing commercial operating models which maintain deferral of U.S. income taxation under subpart F given the IRS's proposed contract manufacturing regulations and the announced changes to the substantial assistance rules for services.

Speakers

Mark S. Klitgaard, Deloitte Tax LLP, San Jose

Michelle D. Korbas, Internal Revenue Service, Oakland

Edwin G. Schuck, Jr., Holme Roberts & Owen LLP, Los Angeles





# The Taxation Section of the State Bar of California Annual Meeting of the California Tax Bar & California Tax Policy Conference November 6-8, 2008

## [11] The Big GAAP: A Guide for Tax Professionals in the Accounting for Uncertain Income Tax Positions in a Transparent World

*Income & Other Taxes co-sponsored by Corporate & Business Entities and Procedure & Litigation*

The adoption of FAS 109 – Accounting for income Taxes and FIN 48 – Accounting for Uncertain Tax Positions (“UTPs”) with the emphasis on greater financial statement disclosure has prompted the IRS and other taxing authorities to retool their approach to audit planning. Panelists will discuss the basic key principles of accounting for income taxes under FAS 109 and FIN 48, with the emphasis on the new recognition, documentation, and presentation requirements using significant federal, state and trans-border tax issues to better appreciate why the taxing authorities around the world are welcoming this new transparency. Panelists will also discuss the interplay between the financial statement transparency mandated by GAAP and the federal tax practitioner standards of Circular 230. No prior accounting experience is presumed.

### Speakers

Deborah Butler, Internal Revenue Service, Washington, DC  
Edward L. Froelich, Morrison & Foerster LLP, Washington, DC  
Maria Hwang, Internal Revenue Service, Oakland  
Jennifer Shearer, Ernst & Young LLP, San Francisco  
Rich Walton, Buchalter Nemer, Los Angeles

## [12] Abuse of Exempt Organizations in the Tax Shelter Context

*Exempt Organizations*

A broad discussion regarding the use of exemption organizations as “tax indifferent entities,” including listed, reportable and of interest transactions involving EO’s and examples from cases being litigated, from public settlement offers (voluntary) advanced by the IRS, and from practitioner experience. The program will also discuss new statutory penalties, as well as civil and criminal consequences to organizations, board members, and officers.

### Speakers

Michael B. Blumenfeld, Internal Revenue Service, Washington, DC  
Paul J. Dostart, Dostart Clapp Gordon & Coveney, LLP,  
San Diego  
Nathan J. Hochman, U.S. Department of Justice, Washington, DC  
Belinda J. Johns, California Attorney General’s Office,  
San Francisco  
Mark E. Matthews, Morgan Lewis & Bockius, Washington, DC

## [13] Sizzling California State & Local Tax Litigation

*CTPC (State & Local Tax)*

An in-depth analysis by our panel of California state tax experts of significant recent California state and local tax court cases.

### Speakers

Steven J. Green, California Office of Attorney General,  
Sacramento  
William C. Hilson, Jr., California Franchise Tax Board,  
Sacramento  
Carley A. Roberts, Morrison & Foerster LLP, Sacramento  
Brian W. Toman, Reed Smith LLP, San Francisco  
Jeffrey M. Vesely, Pillsbury Winthrop Shaw Pittman LLP,  
San Francisco

**10:30 – 11:30 AM**

**1 Hour MCLE, Legal Specialization and CPE Credit**

## [14] Sales and Use Tax Audits: A Guide for Tax Professionals

*Procedure & Litigation co-sponsored by CTPC*

Our panel of sales and use tax experts will discuss how to handle sales and/or use tax audit with the Board of Equalization, including procedural rules and tips for dealing with the BOE.

### Speakers

Dennis Brager, Brager Tax Law Group, Los Angeles  
Robert Tucker, California State Board of Equalization, Sacramento

## [15] (Corporate) Entity Exit Strategies in Estate Planning

*Estate & Gift Tax co-sponsored by Corporate & Business Entities*

This panel will discuss tax issues which must be addressed on termination of an entity which was inherited. Discussion will include the impact of estate taxes on corporate assets (absence of step-up of inside basis); Section 303; the use of partnerships to acquire interests before making distributions; the use of S Corporation elections; the repeal of the General Utilities doctrine and former Section 333; and planning for liquidations in light of the current dividend tax rates and character of gain rules for S Corporations.

### Speakers

Robin L. Klompars, Wagner Kirkman Blaine Klompars &  
Youmans LLP, Mather  
Douglas L. Youmans, Wagner Kirkman Blaine Klompars &  
Youmans LLP, Mather

## [16] Inbound Real Estate Investment in the Era of the Declining Dollar

*International Tax*

Our panel of experts will discuss the state of the dollar as against other currencies and explore the impacts and opportunities with respect to foreign investment in U.S. realty.

### Speakers

Enrique Hernandez-Pulido, Procopio, Cory, Hargreaves &  
Savitch LLP, San Diego  
Jon P. Schimmer, Procopio, Cory, Hargreaves & Savitch LLP,  
San Diego

## [17] The Creative Use of Pass-Through Entities in Corporate Transactions

*Corporate & Business Entities*

This program will describe how pass-through entities can be used to circumvent legal and tax impediments to standard corporate transactions. Examples include the use of disregarded entities in tax-free transactions, such as reorganizations, incorporations and spin-offs, to ensure the requirements for tax-free treatment are satisfied and the use of disregarded entities in taxable transactions to provide a step-up in tax basis despite contractual restrictions on asset transfers.

### Speakers

Phillip L. Jelsma, Luce, Forward, Hamilton & Scripps LLP, San Diego  
Edwin G. Schuck, Jr., Holme Roberts & Owen LLP, Los Angeles





**[18] Humor in the High Court**

*CTPC (State & Local Tax)*

A favorite among state tax professionals, Paul Frankel and Professor Richard Pomp will provide a tongue and cheek exchange regarding current nationwide state tax litigation.

Speakers

Paul H. Frankel, Morrison & Foerster LLP, New York, NY  
Professor Richard D. Pomp, University of Connecticut Law School, Hartford, CT

**11:45-12:45 PM**

**Networking Luncheon (Ticketed Event #52, \$35)**

Grab a box lunch and use the opportunity to network with Conference attendees, speakers, tax committee chairs, government officials, and members of the Taxation Section Executive Committee.

**Friday Afternoon Concurrent Education Panels**

**1:00-2:00 PM**

**1 Hour MCLE, Legal Specialization and CPE Credit**

**[19] California Trustees Beware**

*Procedure & Litigation*

Our panel of trust experts will provide an overview and discussion of income taxation of foreign trusts with California income tax consequences. California's income tax statutes tax foreign trusts, whether or not the trust is located in California, and the Franchise Tax Board has increased enforcement on the taxation of trusts not situated in California but where trustees or beneficiaries are located within the state. The state's enforcement efforts will be covered.

Speakers

Wendy Abkin, Sideman & Bancroft LLP, San Francisco  
G. Michelle Ferreira, Holme Roberts & Owen, LLP, San Francisco  
Christopher Parker, California Franchise Tax Board, Sacramento

**[20] Tax-Efficient Wealth Transfer to Multiple Generations**

*Estate & Gift Tax*

A description of rolling Grantor Retained Annuity Trusts by linking complex strategies, research and execution of requisite documents.

Speaker

Francis Dubreuil, Bernstein Global Wealth Management, San Francisco

**[21] Has the Attorney-Client Privilege Met Its Demise?**

*Income & Other Taxes*

A timely in-depth discussion regarding attorney-client privilege issues in light of current auditing and financial reporting requirements.

Speakers

David Porter, Wood & Porter, San Francisco  
Jay Weill, Sideman & Bancroft LLP, San Francisco

**[22] Use of Retirement Benefits in Charitable Planning**

*Exempt Organizations co-sponsored by Estate & Gift Tax*

A discussion of estate planning and charitable considerations involving the use of qualified retirement plans.

Speaker

William Finestone, Finestone & Richter, Los Angeles

**[23] The BOE's New Rules for Tax Appeals**

*CTPC (State & Local Tax)*

An overview and substantive discussion of the BOE's new Rules for Tax Appeals, which replaced the BOE's entire former appeal procedures.

Speakers

Valerie C. Dickerson, Deloitte Tax LLP, Costa Mesa  
Bradley Heller, California State Board of Equalization, Sacramento

**2:15-3:45 PM**

**1.5 Hours MCLE, Legal Specialization and CPE Credit**

**[24] Revised Return Preparer Penalties and Their Potential Impact on Preparing Returns**

*Procedure & Litigation co-sponsored by Young Tax Lawyers*

Panelists will discuss the new return preparer penalties, the new "more likely than not" standard, the differences between federal and California law on the new penalties, and the overall impact on preparing returns.

Speakers

Deborah Butler, Internal Revenue Service, Washington, DC  
David Kirsch, David M. Kirsch Law Office, San Jose,  
A. Lavar Taylor, Law Offices of A. Lavar Taylor, Santa Ana

**[25] Economic Substance Doctrine:  
Where Do We Stand?**

*Tax Policy, Practice & Legislation co-sponsored by Procedure & Litigation*

A critical analysis of the economic substance doctrine, including a discussion of codification attempts and the most recent round of cases. The panelists will review the development of the economic substance doctrine, examine recent cases which analyze the doctrine, including *Stobie Creek*, *Coltec*, *Jade Trading*, *Countryside Limited* and others, and discuss the 2008 Farm Bill, which contains the latest attempt by Congress to codify the doctrine.

Speakers

Professor Michael B. Lang, Chapman University School of Law, Orange  
Joshua Odintz, United States Senate Committee on Finance, Washington, DC  
Professor Daniel L. Simmons, University of California at Davis School of Law, Davis



# The Taxation Section of the State Bar of California Annual Meeting of the California Tax Bar & California Tax Policy Conference November 6-8, 2008

## [26] California Income Tax Withholding: Unveiling the Mysteries at the FTB and EDD

*CTPC (State & Local Tax)*

Our distinguished withholding tax panelists will discuss the current income tax withholding trends at both the EDD and the FTB, including withholding of income tax for entertainers, athletes, corporate officers, and California source income property. Panelists will also discuss taxation of Native American Indians and related withholding issues.

### Speakers

Bruce Langston, California Franchise Tax Board, Sacramento  
Michele Mosley, California Employment Development

Department, Sacramento

Natasha Page, California Franchise Tax Board, Sacramento

William H. Weissman, Littler Mendelson, PC, San Francisco

## [27] New Developments in Transfer Tax Valuation

*Estate & Gift Tax*

A discussion of marketability discounts, control discounts, tax affecting S-corps, and fractional interest discounts.

### Speakers

Mark C. Higgins, ASA, Higgins Marcus & Lovett, Inc., Los Angeles

John W. Prokey, Ramsbacher Prokey LLP, San Jose

## [28] Sales & Use Tax Hot Topics and Recent Developments

*CTPC (State & Local Tax)*

An in-depth look by our panel of sales and use tax experts at recent California and out-of state sales and use tax cases as well as other sales and use tax hot topic developments.

### Speakers

Randy M. Ferris, California State Board of Equalization,  
Sacramento

Richard E. Nielsen, Pillsbury Winthrop Shaw Pittman LLP,  
San Francisco

Charolette Noel, Jones Day, Dallas, TX

**4:00-5:30 PM**

**1.5 Hours MCLE, Legal Specialization and CPE Credit**

## [29] Federal and State Employment Tax Enforcement: A High Priority Concern for the Government

*Procedure & Litigation*

A discussion of taxpayer obligations for federal and state payroll taxes, including obligations under California and federal labor laws. Panelists will provide a comprehensive overview of the fundamentals and will also provide a road map on how to keep your clients out of trouble. Particular emphasis on federal and state trust fund recovery penalties and how quickly the IRS and the EDD are to find "responsible person" status and personal liability on the part of the business principals with no discharge in bankruptcy. Learn what it means to "have the authority and standing" in a business to be at risk for personal liability.

### Speakers

Theodore "Theo" S. Goodwin, California Employment  
Development Department, Sacramento

Steven J. Mopsick, Mopsick & Williams, LLP, Sacramento

Kirk M. Paxson, Internal Revenue Service, Los Angeles

Betty J. Williams, Mopsick & Williams, LLP, Sacramento

## [30] Paying Competitive Executive Compensation at Tax Exempt Organizations

*Exempt Organizations*

A discussion of the statutory and practical limits on exempt organization executive pay, including the application of IRC Section 4958 and state law. Panelists will discuss techniques for paying competitive compensation that will meet current IRS review standards.

### Speakers

Mark A. Weiner, Internal Revenue Service, Thousand Oaks

J. Patrick Whaley, Musick, Peeler & Garrett LLP, Los Angeles

## [31] What's On the Horizon for the Insurance Valuation Landscape?

*Estate & Gift Tax*

A discussion of traditional life insurance valuation methodologies, recent valuation methods that are being used when selling policies into the secondary market, and how the secondary market valuation methods have changed the insurance valuation landscape.

### Speaker

Timothy J. Gavin, Northwestern Mutual Financial Network,  
Menlo Park

## [32] State Tax Issues Affecting the High Tech Industry

*CTPC (State & Local Tax)*

In-depth discussion of sales factor issues, international issues, and other hot issues for software and other high tech companies.

### Speakers

Edwin Antolin, Silverstein & Pomerantz, San Francisco

David L. Gaul, Cypress Semiconductor, San Jose

David W. Slater, Intel Corporation, Santa Clara

Christopher A. Whitney, PricewaterhouseCoopers LLP, Irvine

**4:00-6:00 PM**

**2 Hours MCLE, Legal Specialization and CPE Credit**

## [33] Ethical Practices in a New World

*CTPC (State & Local Tax)*

Panelists will provide a comprehensive guide to the ethics requirements affecting enrolled agents and to satisfy the ethics study requirement contained in Treasury Department Circular 230. The course highlights potential ethical dilemmas that might arise, and encourages EAs to look for situations they might not ordinarily recognize as potential problems. The instructors will cover some recent cases involving ethical dilemmas, and will discuss the solutions to ethical problems that EAs are likely to encounter in their own practice.

### Speakers

Lynn Freer, EA, Spidell Publishing, Inc., Anaheim

Renee Rodda, Spidell Publishing, Inc., Anaheim



**6:00 – 7:00 PM**

**Conference Reception**

Sponsored by KPMG LLP.

All conferees invited to attend.



**7:30 – 10:30 PM**

**Annual Meeting of the California Tax Bar Dinner  
(Ticketed Event #54, \$60)**

Sponsored by Holme Roberts & Owen LLP.



Holme Roberts & Owen LLP  
Attorneys at Law

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**7:30 – 10:30 PM**

**California Tax Policy Conference Dinner  
(Ticketed Event #55, \$45)**

Sponsored by Morrison & Foerster LLP;  
Pillsbury Winthrop Shaw Pittman LLP;  
and Reed Smith LLP

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**SATURDAY NOVEMBER 8**

**7:00-8:00 AM**

**Continental Breakfast**

**7:30-12:30 PM**

**Conference Registration**

**Saturday Concurrent Education Panels**

**8:00 – 10:00 AM**

**2 Hours MCLE, Legal Specialization and CPE Credit**

**[34] Federal Procedural Roundtable**

*Tax Section Executive Committee co-sponsored by  
Procedure & Litigation*

A review and discussion of the year's important Federal procedural developments from the viewpoint of the Office of Chief Counsel, the U.S. Tax Court, IRS Criminal Investigation, and the Department of Justice's Tax Division.

Speakers

Honorable Mary Ann Cohen, U.S. Tax Court, Washington, DC  
Sharyn M. Fisk, Hochman, Salkin, Rettig, Toscher & Perez,  
Beverly Hills

Nathan J. Hochman, U.S. Department of Justice, Washington, DC  
Donald L. Korb, Internal Revenue Service, Washington, DC  
Luis Tejeda, Internal Revenue Service, Los Angeles

**[35] Fallout of the Economic Downturn: Federal and State  
Tax Consequences of Bankruptcy, Foreclosures and  
Insolvency**

*Income & Other Taxes co-sponsored by Procedure & Litigation*

With the economic downturn and the plagued real estate industry, this panel will provide a timely discussion of the income tax consequences of taxpayers in California who face bankruptcy, foreclosures and insolvency. Panelists will specifically discuss federal and state tax issues surrounding lenders' forgiveness of indebtedness, restructuring loans, changes to the Bankruptcy Code and other tax aspects of insolvency.

Speakers

William D. Alexander, Internal Revenue Service, Washington, DC  
Sanford "Sandy" Holo, Musick, Peeler & Garrett LLP, Los Angeles  
Mark Wallace, Stutman, Treister & Glatt, Los Angeles

**[36] California Regulatory and Administrative Changes:  
Year in Review**

*CTPC (State & Local Tax)*

Technical discussion of recent Franchise Tax Board and Board of Equalization regulations, new, amended, and proposed.

Speakers

Bradley Marsh, Winston & Strawn LLP, San Francisco  
Troy E. Thompson, Reed Smith LLP, San Francisco  
Carla Caruso, California State Board of Equalization, Sacramento  
Patrick Kusiak, California Franchise Tax Board, Sacramento  
Robert Waldow, McDermott Will & Emery, Palo Alto

**[37] The California Tax Administrative Process: What Every  
Taxpayer and Practitioner Need to Know**

*Young Tax Lawyers co-sponsored by CTPC*

Our panel of distinguished private and public state tax practitioners will lead an expansive discussion regarding the administrative appeal procedures at the BOE and FTB.

Speakers

L. Red Gobuty, California Franchise Tax Board, Sacramento  
Bradley Heller, California State Board of Equalization, Sacramento  
Bruce Langston, California Franchise Tax Board, Sacramento  
Christopher Matarese, Ajalat, Polley, Ayoub & Matarese, Glendale  
Robert R. Rubin, McDonough Holland & Allen PC, Sacramento





# The Taxation Section of the State Bar of California Annual Meeting of the California Tax Bar & California Tax Policy Conference November 6-8, 2008

**10:15 – 12:15 PM**

**2 Hours MCLE, Legal Specialization and CPE Credit**

**[38] Overview of the Federal and California Taxpayer Advocate Programs**

*Procedure & Litigation*

The panel will discuss the state's Taxpayer Advocate programs at the EDD, FTB and the BOE and the IRS's Taxpayer Advocate programs. Panelists will cover updates on the issues the California Taxpayer Advocate has faced recently, including success stories. Panelists from state and federal Taxpayer Advocate programs will be present. The panelists will discuss issues which are appropriate for the Taxpayer Advocate, including how and when to contact the advocates, when all else fails.

Speakers

Joseph A. Broyles, The Law Offices of Joseph A. Broyles,  
Los Angeles

Todd Gilman, California State Board of Equalization, Sacramento  
Michele Mosley, California Employment Development  
Department, Sacramento

Nina E. Olson, Internal Revenue Service, Washington, DC

Steve Sims, EA, California Franchise Tax Board, Sacramento

**[39] Buying and Selling Subsidiaries from a Consolidated Group**

*Corporate & Business Entities*

The relatively simple issues involved in buying or selling a target corporation's stock become extremely complex when the target is a member of a consolidated group. Critical issues and elections (read: traps for the unwary) wait at every turn. This is especially true in light of recent changes in the law, including changes to the ever-evolving loss disallowance rules. This all-star panel will provide important and practical guidance for investigating, negotiating and documenting these transactions.

Speakers

William D. Alexander, Internal Revenue Service, Washington, DC  
Julie A. Divola, Pillsbury Winthrop Shaw Pittman LLP,  
San Francisco

Elliot Freier, Irell & Manella LLP, Los Angeles

Patricia W. Pellervo, PricewaterhouseCoopers LLP,  
San Francisco

**[40] Hot Topics with Like-Kind Exchanges**

*Income & Other Taxes*

This program will cover the updates involving Code section 1031 exchanges. Panelists will address the updates and hot topics involve like-kind exchanges and discuss the opportunities and pitfalls in this ever changing area.

Speakers

James M. Gudenau, Comerica Bank 1031 Exchange Services,  
Detroit, MI

Phillip L. Jelsma, Luce, Forward, Hamilton & Scripps LLP, San Diego

**[41] Special Issues in Apportionment and Allocation—What Now? And What about MeadWestvaco?**

*CTPC (State & Local Tax)*

In-depth discussion of "hot" apportionment issues in California Franchise Tax. Discussion of current nationwide hot spots involving apportionment and allocation issues, including requests for equitable relief under UDITPA Section 18 (or its equivalent), cost of performance issues for service industries, throwback and throw-out issues, and the impact of the U.S. Supreme Court's decision in *Mead*.

Speakers

Joe Huddleston, Multistate Tax Commission, Washington, DC

Carl Joseph, California Franchise Tax Board, Sacramento

Kimberley Reeder, KPMG LLP, Mountain View

Arthur R. Rosen, McDermott Will & Emery, New York, NY

Philip M. Tatarowicz, Ernst & Young LLP, Washington, DC

**12:30-2:30 PM**

**Annual Luncheon Program and Awards Presentation (Ticketed Event #57, \$45)**

"The Practice of Tax Law in Today's Changed Law Enforcement Environment"

Keynote Speaker: **Donald L. Korb**, Chief Counsel,  
Internal Revenue Service, Washington, DC.

Presentation of the *V. Judson Klein* and *Joanne M. Garvey* Awards.

**2:30 PM**

**Conference Adjourns**



## REGISTRATION FORM

To pre-register, complete the Registration Form and the Course Selector. Keep a photocopy for your records. Mail or fax the Registration Form and Course Selector. Use a separate Registration Form and Course Selector for each registrant.

**BY FAX:** 415-538-2368. Credit card registrations only. If pre-registration is faxed, do not mail original form.

Fax registrations cannot be confirmed by telephone. Keep a copy of your forms.

**BY MAIL:** Program Registrations, State Bar of California, 180 Howard Street, San Francisco, CA 94105-1639.

**REGISTRATION** (Please print or type name as it should appear on your name badge.)

Name: \_\_\_\_\_ CA State Bar # (if applicable): \_\_\_\_\_

Firm/Company/Organization: \_\_\_\_\_

Address: \_\_\_\_\_

City, State \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone: \_\_\_\_\_ Fax: \_\_\_\_\_

E-mail Address: \_\_\_\_\_ (required for email confirmation) Spouse/Guest name: \_\_\_\_\_

Your name and contact information may be disclosed to other 2008 Annual Meeting attendees and sponsors. ☐ Check here, if you don't want your information disclosed.

**FEES** (Check one. Registration fee includes Friday and Saturday continental breakfasts and Thursday and Friday receptions.)

Tax Section Members

☐ \$525 (Early-Bird Pre-registration received by October 15)

☐ \$595 (Pre-registration received after October 15 and before October 29)

Non-Section Members (Price includes 2008 Taxation section membership of \$75)

☐ \$600 (Early-Bird Pre-registration received by October 15)

☐ \$670 (Pre-registration received after October 15 and before October 29)

☐ Government Employees (Attorney/Non-Attorney) \$120

☐ Law School Faculty/Staff \$120

☐ Law Students \$70

### TICKETED EVENTS

#### Thursday, November 6, 2008

Committee Luncheons—\$35

Check the Committee lunch you plan to attend, below.

[42] ☐ Corporate & Business Entities

[43] ☐ Estate & Gift

[44] ☐ Exempt Organizations

[45] ☐ Income & Other

[46] ☐ International

[47] ☐ Tax Policy, Practice & Legislation

[48] ☐ Young Tax Lawyers

[49] ☐ California Tax Policy Conference Luncheon

[50] ☐ Thursday Cocktail Reception (FREE)

} (# in party) @ \$35 per person = \$ \_\_\_\_\_

I will attend \_\_\_\_\_ (# in party)

#### Friday, November 7, 2008

[51] ☐ Continental Breakfast (FREE)

[52] ☐ Networking Luncheon @ \$35 per person

[53] ☐ Friday Cocktail Reception (FREE)

[54] ☐ Annual Meeting Dinner @ \$60 per person

[55] ☐ California Tax Policy Conference Dinner (CTPC) @ \$45 per person

I will attend \_\_\_\_\_ (# in party) = \$ \_\_\_\_\_  
I will attend \_\_\_\_\_ (# in party @ \$35 ea) = \$ \_\_\_\_\_  
I will attend \_\_\_\_\_ (# in party) = \$ \_\_\_\_\_  
I will attend \_\_\_\_\_ (# in party @ \$60 ea) = \$ \_\_\_\_\_  
I will attend \_\_\_\_\_ (# in party @ \$45 ea) = \$ \_\_\_\_\_

#### Saturday, November 8, 2008

[56] ☐ Continental Breakfast (FREE)

[57] ☐ Luncheon (Keynote/Awards) @ \$45

I will attend \_\_\_\_\_ (# in party) = \$ \_\_\_\_\_  
I will attend \_\_\_\_\_ (# in party @ \$45 ea) = \$ \_\_\_\_\_

**PAYMENT METHOD** Registration fees may be paid by check, Visa or MasterCard (no other credit cards will be accepted).

Make checks payable to the State Bar of California.

**TOTAL AMOUNT ENCLOSED/TO BE CHARGED** = \$ \_\_\_\_\_

### CREDIT CARD INFORMATION

☐ VISA

☐ MasterCard

I authorize the State Bar of California to charge my credit card.

Account Number \_\_\_\_\_ Expiration Date \_\_\_\_\_

Cardholder's Name \_\_\_\_\_ Cardholder's Signature \_\_\_\_\_

For registration information please call 415-538-2508

For program content information please call 415-538-2585

The State Bar of California is a State Bar of California approved MCLE provider.



# COURSE SELECTOR

(CTPC programs are shown in blue.)

Check the appropriate boxes below for the courses you wish to attend. Retain a copy of this form for your records.  
File this form with your Program Registration Form.

Name \_\_\_\_\_ CA State Bar # (if applicable) \_\_\_\_\_

## Thursday, November 6

### 1:30-3:00 PM

- ☐ [1] Getting to YES with the IRS: A Couple of Laps Around the Fast Track in the IRS's Newest Fleet of ADR Vehicles
- ☐ [2] Annual Estate and Gift Tax Update
- ☐ [3] Choice of Entity: Swimming in a Sea of Options
- ☐ [4] The ABC's of Settlement at the FTB and BOE

### 3:15-5:15 PM

- ☐ [5] Offshore Enforcement Update
- ☐ [6] Tax and Estate Planning for the Multinational Family
- ☐ [7] The Credit Crunch – Does it Make Cents to Abandon a Partnership or LLC Interest that is Worthless?
- ☐ [8] California Chief Counsel Roundtable

## Friday, November 7

### 8:15-10:15 AM

- ☐ [9] Federal and State Criminal Tax Investigations and Corporate Fraud
- ☐ [10] A Primer on Navigating the New Dynamic International Tax Planning Environment for High Value Intangibles
- ☐ [11] The Big GAAP: A Guide for Tax Professionals in the Accounting for Uncertain Income Tax Positions in a Transparent World
- ☐ [12] Abuse of Exempt Organizations in the Tax Shelter Context
- ☐ [13] Sizzling California State & Local Tax Litigation

### 10:30 – 11:30 AM

- ☐ [14] Sales and Use Tax Audits: A Guide for Tax Professionals
- ☐ [15] (Corporate) Entity Exit Strategies in Estate Planning
- ☐ [16] Inbound Real Estate Investment in the Era of the Declining Dollar
- ☐ [17] The Creative Use of Pass-Through Entities in Corporate Transactions
- ☐ [18] Humor in the High Court

### 1:00-2:00 PM

- ☐ [19] California Trustees Beware
- ☐ [20] Tax-Efficient Wealth Transfer to Multiple Generations
- ☐ [21] Has the Attorney-Client Privilege Met Its Demise?
- ☐ [22] Use of Retirement Benefits in Charitable Planning
- ☐ [23] The BOE's New Rules for Tax Appeals

### 2:15-3:45 PM

- ☐ [24] Revised Return Preparer Penalties and Their Potential Impact on Preparing Returns
- ☐ [25] Economic Substance Doctrine: Where Do We Stand?
- ☐ [26] California Income Tax Withholding: Unveiling the Mysteries at the FTB and EDD
- ☐ [27] New Developments in Transfer Tax Valuation
- ☐ [28] Sales & Use Tax Hot Topics and Recent Developments

### 4:00-5:30 PM

- ☐ [29] Federal and State Employment Tax Enforcement: A High Priority Concern for the Government
- ☐ [30] Paying Competitive Executive Compensation at Tax Exempt Organizations
- ☐ [31] What's On the Horizon for the Insurance Valuation Landscape?
- ☐ [32] State Tax Issues Affecting the High Tech Industry

### 4:00-6:00 PM

- ☐ [33] Ethical Practices in a New World

## Saturday, November 8

### 8:00 – 10:00 AM

- ☐ [34] Federal Procedural Roundtable
- ☐ [35] Fallout of the Economic Downturn: Federal and State Tax Consequences of Bankruptcy, Foreclosures and Insolvency
- ☐ [36] California Regulatory and Administrative Changes: Year in Review
- ☐ [37] The California Tax Administrative Process: What Every Taxpayer and Practitioner Need to Know

### 10:15 – 12:15 PM

- ☐ [38] Overview of the Federal and California Taxpayer Advocate Programs
- ☐ [39] Buying and Selling Subsidiaries from a Consolidated Group
- ☐ [40] Hot Topics with Like-Kind Exchanges
- ☐ [41] Special Issues in Apportionment and Allocation - What Now? And What about MeadWestvaco?





## HEADQUARTERS HOTEL

Grand Hyatt San Francisco, 343 Stockton Street, San Francisco, CA 94108  
Hotel Direct: 415-398-1234

A special rate of \$223 single or double occupancy plus tax is available for meeting attendees. This rate applies for the nights of November 5, 6, or 7. The special group rate will be made available the day before and after these dates, **based on availability**.



Reserve by phone at 1-800-233-1234 and mention State Bar of California Tax Meeting for the special group rate, or reserve online at <https://resweb.passkey.com/go/calbar>

## REGISTRATION FEES

### Pre-Registration Fees

The "Early-Bird" Pre-Registration deadline is on or before

**October 15, 2008**

The Pre-Registration deadline is after **October 15**, but before

**October 29, 2008**

### Tax Section Members

\$525 (Early-Bird Pre-registration on or before October 15)

\$595 (Pre-Registration received after October 15 and before October 29)

### Non-Section Members

*(price includes \$75 membership fee for 2009)*

\$600 (Early-Bird Pre-Registration on or before October 15)

\$670 (Pre-Registration received after October 15 and before October 29)

**Government Employees** (Attorney/Non-attorney) \$120

**Law School Faculty/Staff** \$120

**Law Students** \$70

### Onsite Registration

On-site registration will be accepted on-site on a space available basis. Fees are \$595 Section Member/\$670 Non-Section Member/\$120 Government Employees or Law School Faculty/\$70 Law Students.

### Cancellation Fees

A refund less a non-refundable fee of \$50 will be made for all registration cancellations received in writing by **October 29, 2008**. No refunds will be made for cancellations after that date.

## GENERAL INFORMATION

### MCLE/Legal Specialization/CPE Credit Information

Earn up to 16 hours of MCLE/Legal Specialization/CPE credit. Attorneys and CPA's must get their badge scanned and/or sign-in at the Conference registration table for their MCLE or CPE credit, and will receive a certificate upon sign-in. Certificates also may serve as a record of legal specialization credit. Contact Doug Youmans at [dyoumans@wkblaw.com](mailto:dyoumans@wkblaw.com) if you are seeking MCLE/CPE credit for out-of-state, by September 15.

### Speaker Substitutions

Speakers may be substituted due to unavailability or scheduling conflicts. No refunds will be given due to speaker substitution.

### Audio CDs

Audio CDs will be available for all educational programs. You can order CDs on-site or any time following the program. For more information contact Versa-Tape at 800-468-2737.

### For More Information

For registration information call 415-538-2508. For program information call 415-538-2580 or visit the State Bar Taxation Section website at: [www.calbar.ca.gov/taxation](http://www.calbar.ca.gov/taxation).

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Law School, and University of  
San Diego School of Law

# 2008 Annual Meeting of the California Tax Bar & California Tax Policy Conference

## The Premier California Tax Education Event



Hotel Reservation Deadline  
**October 9**

Pre-Registration Deadline  
**October 15**

(Early-bird Pre-Registration Deadline)  
**October 29**

(Final Pre-Registration Deadline)



Photographed by Peter M. Ray



Register Online [www.calbar.org/taxation](http://www.calbar.org/taxation)